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April 17, 2023

Granted. So ordered. 4/20/2023

VIA ECF

Hon. J. Paul Oetken United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

J. PAUL OETKEN United States District Judge

Re: <u>United States v. Noel Sanabria</u>, 21-cr-313 (JPO)

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria. I write to respectfully request a one-time modification to Mr. Sanabria's bail conditions to permit him to leave his home on April 28, 2023 and travel to New Jersey to retrieve certain medical and hospital records requested by Probation.

Pre-Trial Services Officer Viosanny Harrison has indicated that Pre-Trial has no objection to this request and the government has informed the defense that it defers to Pre-Trial Services.

Mr. Sanabria has been fully complaint with the terms of his release.

He respectfully requests that he be permitted to leave his home on April 28, 2023 at 12pm and return by 5pm so that he may obtain certain medical records and hospital records at University Hospital in Newark, New Jersey.

As noted, Pre-Trial Services has no objection to this request and the government defers to Pre-Trial Services.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)

Pra Trial Sarvices Officer Viasanny Harri

Pre-Trial Services Officer Viosanny Harrison (via email)